

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO ETHICON WAVE 6 CASES	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO PLAINTIFFS’
MOTION TO EXCLUDE THE TESTIMONY OF MICHAEL KARRAM, M.D.**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively, “Ethicon”) submit this notice in response to Plaintiffs’ Notice of Adoption of Prior *Daubert* Motion of Michael Karram, M.D. for Wave 6, Doc. 4802. In their Notice of Adoption, Plaintiffs adopt and incorporate their *Daubert* motions filed against Michael Karram for Ethicon Waves 1, 2 and 3. *See* Dkt. 2091, 2446, and 2849 (motions) & Dkt. 2092, 2471, and 2851 (memoranda in support).¹ Ethicon hereby adopts and incorporates by reference its Responses to Plaintiffs’ *Daubert* motions filed against Michael Karram, M.D., in Waves 1, 2, 3 and 4. Dkt. 2133, 2524, 2951, and 3785. This response applies to the Wave 6 case identified in Exhibit A to Plaintiffs’ Notice of Adoption.²

¹ On August March 29, 2017, this Court issued a Memorandum Opinion and Order on Plaintiffs’ Wave 2 Motion to Exclude the Expert Testimony of Michael Karram, M.D. [ECF No. 2446], Dkt. 3542 (Opinion and Order), which on July 20, 2017, was adopted for the Wave 3 cases, Dkt. 4174 (Order Adopting).

² Ethicon, LLC, was dismissed from the Campbell matter on June 23, 2017, pursuant to PTO 261 (Doc. 4039).

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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